

# **EXHIBIT 2**

Myers Declaration

**THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**DR. RICHARD CARRIER,**

Plaintiff,

V.

**FREETHOUGHTBLOGS NETWORK, :  
PAUL Z. MYERS, PH.D., THE ORBIT, :  
STEPHANIE ZVAN, SKEPTICON, INC., :  
LAUREN LANE, and AMY FRANK- :  
SKIBA, :**

Defendants.

: Case No. 2:16-cv-00906-MHW-EPD

: Judge Michael H. Watson

## DECLARATION OF PAUL Z. MYERS

I, Paul Z. Myers, Ph.D. declare:

1. I am over 18 years of age and have first-hand knowledge of the facts set forth herein, and if called as a witness could and would testify competently thereto.
2. I have never resided, worked, or operated a business in Ohio. I have never sued anyone in any court in Ohio. I have never registered to vote in Ohio. I have never owned a checking account or paid taxes in Ohio.
3. The only time I recall visiting Ohio was August 2009.
4. I never spoke with Richard Carrier much about his personal life. From a few things he said in the past, I have a vague recollection that he lived in the San Francisco Bay Area.
5. On June 15, 2016, I learned that he had moved because he mentioned it in an e-mail to me. However, the e-mail was vague and did not mention where he had moved from, where he moved to, or why he was moving. A copy of the entire e-mail is attached hereto as **EXHIBIT A**. I did not know him to have any professional connections to the

state of Ohio and could never have guessed that was where he had moved to. I knew nothing about any connections he might have in Ohio except that he'd been having some conflicts with the Secular Student Alliance, which is based in Ohio. I can't see how that would have made Ohio an attractive place for him to move to.

6. The first time I could have possibly suspected that Dr. Carrier had moved to Ohio, was on July 29, 2016, when I received the cease and desist letter from his lawyer which was attached to the Complaint as Exhibit 6. Even then, I only knew that Dr. Carrier's lawyer was in Ohio. Nothing in the cease and desist letter informed me otherwise.

7. The only time I concretely learned that Dr. Carrier was living in Ohio was upon reading a copy of the Complaint in this case.

8. I am one of the founders of freethoughtblogs.com, which is an open platform for freethought writers. Freethoughtblogs is collection of skeptics and critics of dogma and authoritarianism. The site is mainly informational and is designed to encourage independent thinking and individual autonomy.

9. Freethoughtblogs is a Delaware corporation. I serve as the organization's CEO and its principle place of business in in Minneapolis, Minnesota. The organization's CFO, Ed Brayton, lives in Michigan and that is where the organization's bank account is.

10. Freethought blogs does not own or lease property in Ohio. It does not have a bank account in Ohio. It has no employees in Ohio.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.



Dated: 29 Nov 2016

\_\_\_\_\_  
Paul Z. Myers, Ph.D.

**EXHIBIT A**

Email Dated June 15, 2016

**Subject:**FYL...

**Date:**Wed, 15 Jun 2016 21:08:10 -0400

**From:**Richard Carrier <[richard.carrier@icloud.com](mailto:richard.carrier@icloud.com)>

**To:**PZ Myers <[pzmyers@gmail.com](mailto:pzmyers@gmail.com)>

I'm sorry I have been pretty silent and out of contact as I've been away from things on an arduous move and working. But since this is breaking, I wanted you to have a heads up:

<http://freethoughtblogs.com/carrier/archives/10267>